



**SAFEGUARDS INFORMATION**

**Entergy Nuclear Operations, Inc.**  
Pilgrim Nuclear Power Station  
600 Rocky Hill Road  
Plymouth, MA 02360

**Michael A. Balduzzi**  
Site Vice President

May 26, 2005

**Via Overnight Delivery**

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852-2738

**SUBJECT:** Entergy Nuclear Operations, Inc.  
Pilgrim Nuclear Power Station  
Docket No.: 50-293  
License No.: DPR-35

Response to NRC Guidance Regarding Mitigation Strategies

- REFERENCES:**
1. Entergy Letter No. 2.02.022, Response to Issuance of Order for Interim Safeguards and Security Compensatory Measures, dated March 18, 2002
  2. NRC letter from J. E. Dyer to Holders of Licenses for Operating Power reactors as Listed in Enclosure 1, dated February 25, 2005, NRC Staff Guidance for Use in Achieving Satisfactory Compliance with February 25, 2002, Order Section B.5.b

**LETTER NUMBER:** 2.05.038

Dear Sir or Madam:

The NRC issued an Order for Interim Safeguards and Security Compensatory Measures ("Order EA-02-026" or "ICM Order") dated February 25, 2002, for Pilgrim Nuclear Power Station (PNPS).

This order imposed requirements on nuclear power plants licensed pursuant to the Atomic Energy Act of 1954 and Title 10 of the Code of Federal Regulations. Section III.A of the Order required licensees to implement certain changes in physical security plans and emergency planning on an interim basis until final requirements were established. Among other requirements, Entergy Nuclear Operations, Inc. (ENO) was required to complete implementation of the requirements of Section II.B.5.b. of Order EA-02-026 by August 31, 2002.

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Subsequently, the NRC issued Orders, dated April 29, 2003, Requiring Compliance with Revised Design Basis Threat for Operating Power Reactors ("Order EA-03-086" or "DBT Order") and other security related Orders (collectively "Orders") for the PNPS. In many ways, Order EA-03-086 complemented or superseded requirements the interim measures imposed by Order EA-02-026.

As required by Order EA-03-086, the plans for PNPS have been implemented. Subsequently, ENO was requested to respond to your letter dated February 25, 2005, NRC Staff Guidance for Use in Achieving Satisfactory Compliance with February 25, 2002, Order Section B.5.b, ("NRC B.5.b. Guidance") by May 31, 2005, and to implement appropriate enhancement to current mitigation strategies by August 31, 2005. Specifically, nuclear power plant licensees were requested by Enclosure 2 of the February 25, 2005 letter, Developing Mitigating Strategies / Guidance for Nuclear Power Plants to Respond to Loss of Large Areas of the Plant in Accordance with B.5.b of the February 25, 2002, Order (dated February 24, 2005) ("NRC B.5.b. Guidance"), letter to review the Areas of Consideration delineated in Attachment A to that Enclosure and evaluate additional considerations for potential inclusion in the licensees' mitigating strategies that licensees deemed appropriate in accordance with the expectations in Attachment B to that Enclosure.

Subsequently, the Nuclear Energy Institute ("NEI"), in conjunction with the NEI Security Working Group, developed and issued guidance for licensee use ("NEI Guidance") to assist licensees in responding to the February 25, 2005, letter.

As requested in the February 25, 2005, letter, ENO has reviewed the information in Attachments A and B in accordance with the NEI Guidance and is hereby submitting, as a Safeguards Information enclosure to this letter (Enclosure), ENO's evaluation of the information the NRC provided. The enclosure reflects the results of our review of the guidance and describes the considerations that ENO either has already or intends to implement at PNPS by August 31, 2005.

The primary guiding principles used in the conduct of this evaluation were (1) whether or not equipment and resources were "readily available," and (2) if equipment is readily available, can it be effectively utilized in a licensee's mitigating strategy. ENO considered "readily available" to mean that the equipment or resources were already licensee owned, under contract, or part of an existing Memorandum of Understanding. Further, even if equipment and resources are readily available, the second criterion is to ensure that the equipment can be used in a mitigating strategy in an effective manner. Even if the equipment is readily available, it is of no value if it cannot be effective in implementing the mitigating strategy.

In accordance with these principles, mitigative strategies are being implemented to address the NRC B.5.b. Guidance. These strategies are considered to be commitments for that purpose and will be managed in accordance with ENO's commitment management system.

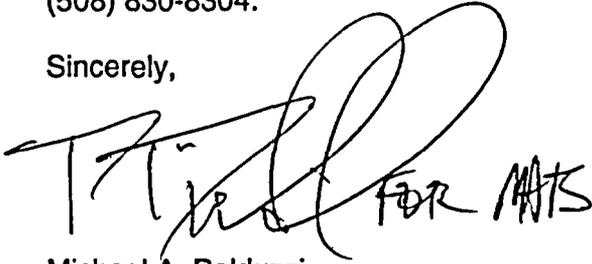
The Attachment to this letter is the schedule that ENO has developed regarding the implementation of identified commitments resulting from the evaluations documented in the Enclosure.

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If you have any questions, or require additional information, please contact Mr. Bryan Ford at (508) 830-8304.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Balduzzi" with a large flourish at the end. Below the signature, the words "FOR MATS" are written in a similar cursive style.

Michael A. Balduzzi

Attachment - Schedule for Completion of Actions and List of Regulatory Commitments  
Enclosure - ENO Evaluation of NRC B.5.b Guidance

cc:

Mr. Samuel J. Collins  
Regional Administrator, Region I  
U. S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406-1415

Mr. J. E. Dyer  
Director, Office of Nuclear Reactor Regulation  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

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